

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

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**In Re:**

**WILLIAM ANDREW URBAN, SR.  
*d/b/a Urban Escort Car Service*  
RHONDENA YVONNE URBAN**

**Case No. 16-24990-gmh**

**Chapter 13**

**Debtors.**

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**OBJECTION OF TALMER BANK AND TRUST TO CHAPTER 13 PLAN**

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NOW COMES Talmer Bank and Trust (hereinafter “Creditor”), by its attorneys, Wynn at Law, LLC, and objects to the Chapter 13 Plan of William Andrew Urban, Sr. and Rhondena Yvonne Urban (hereinafter “Debtors”) filed on June 7, 2016. In support hereof, Creditor states:

1. The Debtors filed for relief under Chapter 13 of the U.S. Bankruptcy Code (11 U.S.C § 101 et seq.) on May 16, 2016 (the “Petition Date”). Mary B. Grossman is the Chapter 13 Trustee.

Drafted by:  
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2. Creditor is secured by a note and mortgage against real estate and improvements, as described in the loan and mortgage, attached hereto, commonly known as 3610 N 37<sup>th</sup> Street, Milwaukee, Wisconsin 53216 (hereinafter the “Collateral.”) The Collateral is owned by the Debtors and used as rental property.
3. Creditor filed a Proof of Claim on June 19, 2016 showing an arrearage of \$92,391.94 being owed to the Creditor.
4. Debtors’ Plan does not provide for curing any arrearage owed to Creditor.
5. The Plan does not comply with the requirements of Sections §1322 and §1325 of the Bankruptcy Code (in particular §1322(b)(5) and §1325(a)(5)). Creditor does not accept the Plan. The Plan does not provide for how Creditor’s secured claim will be paid in full through the Plan.
6. Creditor reserves its right to assert other basis for objections to the Plan, and other relief arising from post-petition date defaults of Debtors.
7. Our firm is a debt collector. This objection is an attempt to collect a debt, and any information obtained will be used for that purpose.

Wherefore, Creditor requests that the Court deny confirmation of the Plan and grant any and all other relief as the Court may deem just and equitable.

Dated this 3rd day of August, 2016

WYNN AT LAW, LLC  
Attorneys for Creditor

By: /s/ Shannon E. Wynn  
Shannon E. Wynn  
SBN:1064001